

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MISSOURI**

STACY ARNOLD, )  
                        )  
                        )  
Plaintiff,         )                      Case No. 19-CV-06137-BP  
v.                    )  
                        )  
CITY OF ST. JOSEPH, ET AL., )  
                        )  
                        )  
Defendants.        )

**DEFENDANT ST. JOSEPH PUBLIC LIBRARY'S MOTION FOR EXTENSION OF  
TIME TO ANSWER OR OTHERWISE PLEAD**

**COMES NOW** Defendant St. Joseph Public Library ("Defendant") by and through its attorneys, McAnany, Van Cleave & Phillips, P.A. and requests additional time in which to plead in response to Plaintiff's Complaint for Declaratory Relief, Injunctive Relief and Damages (ECF No. 1).<sup>1</sup> The responsive pleading to the Plaintiff's Complaint for Declaratory Relief, Injunctive Relief and Damages (ECF No. 1) is presently due on or about November 25, 2019. The responsive pleading deadline for Defendant's responsive pleading has not expired as of the date of filing of this motion. No previous extensions have been requested. Due to counsel's demands on other legal matters, additional time is needed to prepare a responsive pleading. Defendant would request an additional fourteen (14) days, or until December 9, 2019, to file its responsive pleading. Counsel for Defendant has contacted Plaintiff and she has no objection to this requested extension.

WHEREFORE, Defendant St. Joseph Public Library requests an additional fourteen (14) days, until December 9, 2019, to answer or otherwise plead to Plaintiff's Complaint for

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<sup>1</sup> In seeking an extension, Defendant expressly does not waive any other affirmative defenses available to it in this action including those enumerated in Fed.R.Civ.P. 8, 9 & 12. To the extent necessary to preserve any such defenses, Defendant raises the same herein.

Declaratory Relief, Injunctive Relief and Damages (ECF No. 1).

Respectfully submitted,

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By: /s/ Gregory P. Goheen  
Gregory P. Goheen #58119

Attorneys for Defendant St. Joseph Public Library

**CERTIFICATE OF SERVICE**

I hereby certify that on the 25<sup>th</sup> day of November, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system and sent a copy via U.S. mail, postage prepaid to the following:

Stacy Arnold  
500 Westover Drive #11589  
Sanford, NC 27330  
Plaintiff, *pro se*

Mark Beam-Ward  
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Overland Park, KS 66210  
Attorneys for Defendant Roger Clary

/s/ Gregory P. Goheen